

March 9, 2009

Ms. Laura Sinram  
Senior Campaign Finance Analyst  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C0075820) is in receipt of your Request for Additional Information dated February 4, 2009 regarding our 2008 12 day Pre-General FEC report.

Your letter indicates that the Committee disclosed in-kind, independent and coordinated expenditures for the same candidates or the opponents of those candidates. The Committee complied with all rules and regulations regarding independent expenditures. Committee staff working on independent expenditures are not permitted to have contact about their work with the campaigns, regular Committee staff, or Committee leadership. The filings are correct as filed and meet the standard established by the Commission and the courts.

The line 15 receipts referenced in your letter from Buckeye Liberty PAC resulted from payments to Verizon. The reimbursements from Chris Lee for Congress, Connecticut Republican State Central Committee, Glenn Thompson for Congress, Joe Knollenberg for Congress, Sandy Treadwell for Congress, Thad McCotter for Congress, Tim Walberg for Congress, and Tom Manion for Congress result not from expenditures to these entities, but from payments made to Whitaker Askew.

With regard to the listing of "Missing 48 Hour Notice" (Schedule E), the payment of \$ 18,633.89 to Revolution Media Group on 10/15 qualified as an independent expenditure on 10/16, and was included on a Schedule E filed on 10/17. The payment of \$ 32,300 to The Stoneridge Group, LLC on 10/14 qualified as an independent expenditure on 10/17, and was included on a Schedule E filed on 10/18.

The Committee believes its procedures are in compliance with the best efforts provisions cited in your letter, and has outlined its procedures in its responses to several previous RFAs.

With respect to the information that is provided by the donors, the regulations cited in your letter require that we ask contributors to supply employer/occupation information, but do not compel the contributors to comply with the Committee's requests. The Committee has reported all the information it has in its possession in an attempt to satisfy both the intent and the substance of 11 CFR 100.12, 11 CFR 104.3, and 11 CFR 104.7. In addition, the Committee can find no guidance in the statute or regulations that allow it to add to or subtract from information that is voluntarily provided to it from its contributors, nor is there any indication in the statute or regulations that the descriptions referred to are inadequate listings for employer and/or occupation. In addition, the Committee notes that it updates its employer/occupation data as it is received from donors.

The Committee has reviewed all reimbursements to individuals for travel and subsistence and can as you requested confirm that no further itemization is required under any Commission regulations for these expenditures.

The Committee reported on Schedule E disbursements to Arena Communications, Ayres McHenry and Associates, Campbell Holste, Comtech Design Print and Mail, Crossroads Media LLC, Greener and Hook LLC, Majority Strategies, McLaughlin and Associates, Inc., Media Ad Venturs, Inc., Mentzer Media Services, Inc., National Research, Inc., Orman Communications, Public Communications Strategies, Revolution Media Group, Scott Howell and Company, LP, Stevens Reed Curcio and Potholm, Strategic Media Placement, The Hopper Company, The Innovative Agency LLC, The Stoneridge Group LLC, The Strategy Group

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**ETEXT ATTACHMENT**

for Media, Inc., and The Tarrance Group as of the date of the expenditures. Once the expenditures qualified by date of dissemination as an independent expenditure, the required 48-hour Schedule E notice was then filed within the appropriate timeframe. Therefore, no amendment is necessary with respect to these disbursements.

The payments referenced in your letter for Catering, Fundraising Phone Calls, Media Consulting, Postage, and Printing were operating and administrative payments solely benefiting and on behalf of the National Republican Congressional Committee. As such, they were not made on behalf of any specifically identified federal candidates, nor did they constitute public communications or voter drive activity containing express advocacy. Therefore, these disbursements are as you noted correctly reported on Schedule B for Line 21b, and do not require a Schedule B, Schedule E, or Schedule F for lines 23, 24 or 25.

The Committee has filed an amended Form 1 to list PNC as a depository.

Sincerely:

Keith A. Davis, Treasurer  
National Republican Congressional Committee